

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Sangamon Street Right of Way - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #1  
Sangamon Street Right of Way  
C54R  
Chicago, IL

**To:**

**From:** Steven Faryan, On-Scene Coordinator

**Date:** 7/12/2016

**Reporting Period:** 6/20/2016-7/12/2016

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C54R	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	9/8/2015
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	6/20/2016	<b>Start Date:</b>	6/20/2016
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	ILN000505581	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time Critical Removal Action

#### 1.1.2 Site Description

As part of the investigation phase of the Lowenthal removal project, EPA requested access to the BNSF Right of Way which borders the Loewenthal Site on the east boundary, to delineate the extent of contamination. It was agreed that on behalf of the EPA, the BNSF contractor would collect the necessary soil samples at the designated EPA sampling locations and split samples. These samples were collected on June 21, 2013. In addition to the EPA sampling activities, TRC collected three additional soil samples on June 21, 2013, one block north of the EPA sampling locations (north of Cullerton Street) along the BNSF ROW and east of Sangamon Street. The City of Chicago also owns and maintains a side walk and portions of the Sangamon right of way.

U.S. EPA signed an action memorandum documenting the site conditions on September 8, 2015 and began negotiations to sign a consent order with BNSF railroad to complete the removal action. The consent order with BNSF was signed on March 16, 2016. The removal action work plan which was prepared by BNSF's contractor and all accompanying plans were attached to the consent order.

##### 1.1.2.1 Location

The BNSF Sangamon Right of Way is located in the City of Chicago, Cook County, and runs from 16th Street south along Sangamon Street to 21st Street. The right of way between 16th and 18th street will be fenced off to prevent access and is being assessed separately due to being adjacent to the National Lead Site, which is a site that was in the IEPA voluntary remediation program. The BNSF right of way is located adjacent to the City of Chicago's right of way which includes Sangamon Street and the sidewalk that runs along the west side of the right of way.

##### 1.1.2.2 Description of Threat

Based on the results of the soil samples collected and analyzed for total lead, 33 soil boring locations on the BNSF ROW have total lead concentrations above 800 mg/kg, which is the above the RML for industrial and residential values. In addition, six sample locations were above the TCLP for lead of 5 mg/l, which is above the RCRA criteria and as such this material will have to be managed as a hazardous waste.

The high levels of lead that were documented meet the criteria for a Superfund Removal Action and as such

an Administrative Order on Consent was signed with BNSF to conduct the removal of the soil.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

A Kick off meeting was held on June 16, 2016 with BNSF contractors to initiate the site work and go through questions. BNSF contractors mobilized to the site June 20, 2016 to begin the removal action. Site Safety Plans were reviewed and signed and daily tail gate safety meetings are being conducted.

Between 6/20/2016 and 6/24/2016 Stiles completed cutting and breaking rail lines located on the BNSF ROW.

Between 6/23/2016 and 6/24/2016 Stiles completed mixing process of free flow mixture into areas identified as having soil which exceeded RCRA criteria. This mixing process was completed in order to fixate lead found within the soil in order to lower the levels present and allow it to be sent off as non-hazardous waste. Following fixation TRC collected composite samples to confirm that that mixing process had been successful. These results showed that the lead levels had been lowered to below RML values and the soil could be treated as non-hazardous and disposed of with the rest of the excavation.

On 6/27/2016 Stiles began excavating on the southern end of the property near 21st Street. Stiles will continue to excavate section by section north until they reach 18th Street. Stiles completed excavation to 18th Street on 7/12/2016. The excavated soil is being transported to Waste Management Laraway Landfill located in Joliet, Illinois.

TRC is utilizing two DUSTTRAK 2 particulate monitors, one stationed upwind and one downwind of the excavation area, each day while work is on going. These monitors are set to log continuously and have been uploaded to a secure database. TRC has made the air monitoring data available to EPA and results have been below Site action levels.

On 6/30/2016 Tetra Tech Inc. START collected an 8 hour personal lead sample using a Gillian pump and sample cassette to ensure that the site is operating in compliance with OSHA regulations.

A personal data ram has been deployed in the cab of both the excavator and bulldozer to monitor dust levels for on site personnel.

#### 2.1.2 Response Actions to Date

Stiles, a subcontractor to TRC, has excavated the top 24 inches of soil from the entirety of the BNSF ROW. A survey laser was utilized by TRC to confirm that the proper depth was achieved. TERRA Engineering has been on-site to complete a post excavation survey of the work area. To date a total of 4584.79 tons of non-hazardous soil has been loaded into trucks and transported to Waste Management Laraway landfill in Joliet, Illinois and was used as daily cover at the landfill.

Stiles has begun backfilling the excavated areas with 18" of CA7 stone and will begin backfilling with 6" of topsoil on top of the stone on 7/13/2016

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

#### 2.1.4 Progress Metrics

Excavated Soil to date.

<b>Waste Stream</b>	<b>Date</b>	<b># of Trucks</b>	<b>Volume (Tons)</b>
Soil	6/27/2016	27	511.11
Soil	6/28/2016	27	523.33
Soil	6/29/2016	20	405.43
Soil	6/30/2016	24	483.33
Soil	7/1/2016	19	391.59
Soil	7/5/2016	18	384.89
Soil	7/6/2016	25	515.41
Soil	7/7/2016	28	570.26
Soil	7/8/2016	38	799.44
<b>TOTAL</b>			<b>4584.79</b>

## 2.2 Planning Section

### **2.2.1 Anticipated Activities**

USEPA and Tetra Tech will oversee BNSF contractors as they complete removal and backfilling operations and ensure that project is completed according to approved work plans.

#### **2.2.1.1 Planned Response Activities**

BNSF contractors will be completing excavations and moving on to backfilling of the excavated areas using 16 inches of CA7 stone and 6 inches of topsoil. The area will be seeded to prevent erosion.

#### **2.2.1.2 Next Steps**

BNSF contractors will continue the disposal of non-Hazardous soil as necessary. Once excavation is completed project focus will then shift to backfilling of excavated areas. The soil will be seeded to prevent erosion. A final survey will be conducted to document elevations and site conditions. The City of Chicago is in the planning phase of the El Paseo project which will be a green trail running from 21 st street to 18th street.

### **2.2.2 Issues**

Work was delayed on 7/6/2016 due to lightening in the morning.

### **2.3 Logistics Section**

No information available at this time.

### **2.4 Finance Section**

No information available at this time.

### **2.5 Other Command Staff**

#### **2.5.1 Safety Officer**

Chris Draper-START Health and Safety Officer

Tyler Gomoll-ERRS Health and Safety Officer

#### **2.5.2 Information Officer**

USEPA Community Involvement Coordinator Heriberto Leon has been meeting with the neighborhood community groups. Fact Sheets were handed out in the 1/2 mile square area around the property. A public meeting and open house were held to provide facts and answer questions from the residents. An open house was held at the neighboring Resurrection Project apartments to brief the residents and media and answer questions.

U.S. EPA has provided fact sheets. All of the fact sheets have been reproduced in English and Spanish.

An open house was held on June 15, 2016 at the CASA Maravilla at 2021 S. Morgan in Chicago, Illinois from 5-7. Approximately 30 residences attended the open house.

## **3. Participating Entities**

### **3.1 Unified Command**

US EPA is providing oversight of BNSF contractors

### **3.2 Cooperating Agencies**

City of Chicago

## **4. Personnel On Site**

EPA-1

START-1

TRC-2

Stiles-5

## **5. Definition of Terms**

BNSF-Burlington Northern Santa Fe

RCRA-Resource Conservation and Recovery Act

RML-Removal Management Levels

ROW-Right of Way

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

[www.epaosc.org/sangamonstreet](http://www.epaosc.org/sangamonstreet)

## **6.2 Reporting Schedule**

POLREP will be generated weekly until project is completed

## **7. Situational Reference Materials**

No information available at this time.